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COMMISSION

Athens BH Development, LLC
2016 OCT 31 AM 11:53

OFFICE OF GENERAL
COUNSEL

October 24, 2016

VIA EMAIL & U.S. MAIL

Ms. Donna Rawls
Federal Election Commission
Office of Complaints & Examination & Legal Administrative
999 E Street, NW
Washington, DC 20463

RECEIVED
FEC MAIL CENTER
2016 OCT 31 AM 7:48

RE: MUR 7141 – Athens B.H. Development, LLC

Dear Ms. Rawls:

Your letter dated September 30, 2016 regarding a complaint filed with your office with respect to Athens B.H. Development, LLC ("Athens BH") was delivered to our Phoenix, Arizona office on October 10, 2016. Please note that the Federal Election Commission ("FEC") sent this letter to Athens BH's office in Arizona, instead of the Beverly Hills office where I am located which has an address at 433 North Camden Drive, Suite 960, Beverly Hills, CA 90210

Athens is a real estate development company based in Arizona which is part of the development team for the One Beverly Hills project in Beverly Hills, California, along with Wanda Beverly Hills Properties, LLC ("Wanda Beverly Hills"). Wanda Beverly Hills set up a political committee, known as "Beverly Hills Residents and Businesses to Preserve Our City," in order to oppose an initiative which will appear on the November ballot about a project located next to the One Beverly Hills project. Athens BH is one the "sponsors" of this committee, and I am also listed as a "principle officer" of the committee, because I, along with my counterpart at Wanda Beverly Hills, decide how the committee will oppose this initiative.

It is my understanding that the complaint alleges this political committee received contributions from a "foreign national." However, the complaint does not identify any alleged violation of the law by Athens BH. Even though I work with Wanda Beverly Hills on how the committee will oppose the initiative, Athens BH has not made any monetary contributions to the committee. Furthermore, I am a United States citizen.

433 N. Camden Drive, Suite 960
Beverly Hills, CA 90210
Office 310-746-5515

Although I periodically make personal contributions to candidates for state and local office in California, I have not made a contribution to a candidate for federal office for several years.

Because the complaint does not make any allegations against Athens BH, and because Athens BH has not made any political contributions in violation of federal law, I would appreciate the FEC immediately closing this matter. Please contact me directly if you need any additional information.

Sincerely,



Jay Newman, Member
Athens B.H. Development, LLC